

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 2:21-CR-98
)	
BERNARD SMITH)	
)	
Defendant.)	

**DEFENDANTS' MOTION TO CONTINUE PRETRIAL
CONFERENCE AND JURY TRIAL**

The defendant, Bernard Smith by Counsel Russell W. Brown, Jr. of The Region Lawyers, Inc. moves to continue the pretrial conference currently scheduled for July 31, 2025, the Jury Trial currently scheduled for August 25, 2025, at 8:30 a.m. and extend the deadline to file pretrial motions currently set and in support thereof states the following:

1. Counsel has continued discussing and negotiating with the Government on a potential pretrial resolution but needs additional time.
2. The Defendant respectfully requests that the pretrial conference and the jury trial be continued in this case.
3. The Defendant further requests that the deadline for pretrial motions be extended to 45 days before the jury trial setting.
4. Defendant has been advised and agrees that any period of delay due to the enlargement of time to prepare pretrial motions is excludable under the Speedy Trial Act.
5. Additionally, Defendant agrees that the delay in trial occasioned by the continuance is excludable for the purpose of the Speedy Trial Act.
6. The government, by AUSA David Nozick, does not object to the granting of this Motion.

WHEREFORE, the defendant requests that the Court grant this Motion and for all other appropriate relief.

Respectfully submitted,

s/ Russell W. Brown, Jr.
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CERTIFICATE OF SERVICE

I certify that on July 1, 2025, I filed the foregoing document using the CM/ECF filing system that served copies on all counsel of record.

/s/ Russell W. Brown, Jr.
Russell W. Brown, Jr.